

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SUSAN HALL,

Plaintiff,

-against-

SAMANTHA REAY, *in her capacity as
personal representative of the* ESTATE OF
ROBERT M. ADELMAN,

Defendant.

Case No: 1:20-cv-02436-LGS

REPLY DECLARATION OF NANCY E. WOLFF

NANCY E. WOLFF, being duly sworn, deposes and says:

1. I am a member of the Bar of this Court and a partner in the law firm of Cowan, DeBaets, Abrahams & Sheppard LLP, attorneys for defendant Samantha Reay (“Defendant”), in her capacity as personal representative of the Estate of Robert M. Adelman (the “Estate”).

2. I submit this reply declaration in further support of Defendant’s motion for judgment on the pleadings, pursuant to Fed. R. Civ. P. 12(c), seeking dismissal of plaintiff Susan Hall’s (“Plaintiff”) Complaint, dated March 19, 2020 (the “Motion”). *See* Dkt. No. 1. Alternatively, Defendant requests that the Court convert her Motion to a motion for summary judgment pursuant to Fed. R. Civ. P. 12(d).

3. On September 21, 2017, in connection with the probate proceeding for the Estate, counsel for Defendant took the deposition of Plaintiff in New York (the “Deposition”).

4. Attached hereto as **Exhibit A** is a true and correct copy of excerpts from the transcript of Plaintiff’s Deposition.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: New York, New York
August 17, 2020

/s/ Nancy E. Wolff
NANCY E. WOLFF